

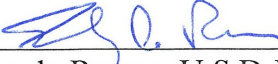
Andrew R. Dunlap
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May 11, 2022

Via ECF

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

The Court grants Defendants' motion
to seal. SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: May 13, 2022
New York, New York

**Re: *Deutsche Bank Securities Inc. v. Kingate Global Fund Ltd., et al.,*
No. 19-cv-10823-ER (S.D.N.Y.)**

Dear Judge Ramos,

We write on behalf of Defendants Kingate Global Fund, Ltd. and Kingate Euro Fund, Ltd. (the “Funds”), pursuant to Paragraph 3.ii of Your Honor’s Individual Practices, for approval to file a redacted version of Defendants’ reply memorandum (“Reply”) in support of their motion to compel Plaintiff Deutsche Bank Securities Inc. (“DBSI”) and three non-parties (the “Withholding Investors”)¹ to produce documents they are withholding based solely on the common interest doctrine.

The Funds’ Reply describes documents that DBSI has designated as “Confidential,” which, according to the Protective Order, represents DBSI’s good faith judgment that disclosure of the information would “be detrimental to the conduct of [DBSI’s] business or the business of any of [its] customers or clients.” See ECF No. 48 ¶ 2(a).² Paragraph 12 of the Protective Order requires the Funds to file such information under seal.

The Funds respectfully request that the Court grant this letter motion allowing the Funds to file the proposed redacted version of the Reply.

Respectfully submitted,

/s/ Andrew R. Dunlap
Andrew R. Dunlap

¹ The Withholding Investors are: Centerbridge Partners LP, Farallon Capital Management LLC, Solus Alternative Asset Management LP.

² The Funds take no position on and reserve all rights to challenge these confidentiality designations.

The Honorable Edgardo Ramos
May 11, 2022

/s/ Hugh M. McDonald
Hugh M. McDonald

*Attorneys for Defendants Kingate
Global Fund Ltd. and Kingate Euro
Fund Ltd.*

Cc: Counsel of Record